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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
HON. DANA M. SABRAW

UNITED STATES OF AMERICA

Plaintiff,

vs.

RODOLFO VETA, JR.,

Defendant.

) 07 CR 3365 - DMS

) RODOLFO VETA, JR.'S

) MOTION FOR ORDER LEAVE TO FILE
) SENTENCE MEMORANDUM AND
) MOTION DOWNWARD ADJUSTMENT
) MINIMAL ROLE/ MOTION
) DOWNWARD DEPARTURE
) ABERRANT BEHAVIOR/ SENTENCE
) MEMORANDUM

) Date: 03/14/08

) Time: 09:00 a.m.

) Dept: Hon. Dana M. Sabraw

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND HER DESIGNATED
ASSISTANT AUSA, ANDREW SCHOPLER.

MOTION

Defendant, Rodolfo Veta, Jr., is set for sentencing on February 14, 2008, at 9:00 a.m.,
before the Honorable Judge Dana M. Sabraw and this motion moves the court to shorten time for
the filings of his sentence motions no later than March 13, 2008.

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2 DECLARATION IN SUPPORT OF ORDER

3 My name is Charles N. Guthrie and I am the court appointed CJA attorney for Rodolfo
4 Veta, Jr. I have been involved in a complicated jury trial as well as advising a Material
5 Witness in a homicide case within the last two weeks. Sentence motions were filed in Mr. Veta,
6 Jr.'s case; however upon review they had to withdrawn because the motions were asking for
7 more than the plea agreement allowed.
8

9 I believe the late Sentence Memorandum, Summary Chart, and Motion Downward
10 Adjustment for Minor Role with Points and Authorities will not prejudice the prosecution in that
11 no new issues are raised.
12

13 I declare/ certify the above true under penalty of perjury executed this March 13, 2008, in
14 the City of San Diego, State of California.

15 S/ Charles N. Guthrie
16 Charles N. Guthrie

17 ARGUMENT

18 The proposed sentence memorandum and sentence summary chart, Motion for
19 Downward Adjustment Minor role and Points and Authorities contain no new or novel issues
20 and will not prejudice the prosecution.
21

22 The court is respectfully moved to allow defendant file his sentence motions no later than
23 Thursday, March 13, 2008.

24 Respectfully submitted,

25 March 13, 2008

26 s/Charles N. Guthrie
27 Charles N. Guthrie, Atty at Law
28